

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CAPANA SWISS ADVISORS, AG, et al.,

Plaintiffs,

v.

RYMARK INC., et al.,

Defendants.

Case No. 2:25-mc-00005-AB

Judge Anita B. Brody

Originating Court: D. Utah

Originating Case No.: 2:23-CV-00467

**NOTICE OF SUPPLEMENTAL
AUTHORITY**

John Simkiss (“Movant”) respectfully gives notice to the Court regarding the order granting a motion to quash by the District of Delaware in a matter filed by H2E Americas, LLC (“H2E”), of which Movant is a member. Mem. Order (“Order”), No. 25-00029-RGA-SRF (D. Del. Apr. 1, 2025), ECF 22, attached hereto.

The Delaware matter involved a similar challenge to subpoenas almost identical to those improperly served on Movant. The District of Delaware quashed the document subpoena and deposition subpoena issued to H2E on the basis that it did not give a reasonable time to comply, imposed an undue burden on H2E, and amounted to a fishing expedition, among other reasons. Order 6-8.

Respectfully submitted,

GOLDSTEIN LAW PARTNERS, LLC

Dated: April 26, 2025

s/ David R. Osborne

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